



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

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EPA Region 5 Records Ctr.



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REPLY TO THE ATTENTION OF

January 11, 2005

(SR-6J)

Mr. Thomas Holdener, P.E.
St. Clair County Department of Roads and Bridges
1415 North Belt West
Belleville, IL 62226-5999

RE: Judith Lane road and drainage improvement work, Sauget Area One Site,
Cahokia, Illinois

Dear Mr. Holdener:

On October 26, 2004, a coordination meeting was held between the U. S. EPA (the Agency), IEPA, PRPs, and with the State and County Highway Departments to discuss the Judith Lane road and drainage improvement work that the county intends to construct in 2005. This correspondence should serve as the Agency's concurrence with the project as agreed to during the meeting.

Judith Lane intersects the Dead Creek. The Dead Creek is a part of the Sauget Area One Superfund Site that is located in Cahokia and Sauget, Illinois. The Judith Lane road and drainage improvement work consists of reconstructing the existing 22' wide roadway with new 30' face to face bituminous pavement, B6.24 concrete curb and gutter, and storm sewer. The existing 54" concrete culvert will be extended to match the proposed side slopes. The 24" metal pipe will be replaced with a 24" concrete pipe, and two new 36" storm sewers will discharge at Dead Creek.

During the meeting the PRP agreed to excavate between 70 and 90 cubic yards of soil from the creek and replace it with clean fill eliminating the County's need for special waste disposal. The County and the Highway Department will be responsible for staking out the excavation locations and grades in order for the excavated material to be placed in the TSCA containment cell on Judith Lane.

The lining of Creek Sector B will be completed by the time that the road and drainage works commence. Consequently, it was agreed to provide the County with details of the lining system design. This will allow the County to include these details in their bid documents. The Agency expectation is that the County will restore the lining at the culvert locations on the upstream side of Judith Lane.

Attached to this letter is IEPA's comments. If you have any questions regarding this letter, please do not hesitate to contact me at 312/886-6840.

Sincerely,



Nabil Fayoumi
Remedial Project Manager
Superfund Division

Enclosure

cc via e-mail:

Sandra Bron, IEPA
Steve Smith, Solutia
Mark Reitz, Hurst-Roche Engineers, Inc.

bcc:

file room ✓
Thomas Martin, USEPA
Thomas Short, USEPA

217/782-6762

January 11, 2005

Mr. Nabil Fayoumi
U.S. EPA Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, Illinois 60604-3590

Re: 1630200005-St. Clair County
Sauget Area 1
Superfund-Technical Reports

Dear Mr. Fayoumi:

This letter concerns the proposed road improvement project on Judith Lane (County Highway 11), from IL RTE 3 (Mississippi Avenue) to Falling Springs Road (CH10), in the Village of Cahokia, Illinois. The project will include construction of new 30 foot face to face bituminous pavement, Type B6.24 concrete curb and gutter, and storm sewer. Judith Lane crosses Dead Creek approximately half way between RTE 3 and Falling Springs Road. The proposed road improvement project will include work at the Dead Creek crossing, consisting of extending the existing 54 inch concrete culvert to match proposed side slopes, replacing the existing 24 inch corrugated metal pipe with concrete pipe, and installing two 36 inch storm sewer outlet pipes with discharge to Dead Creek. Dead Creek is subject to a Unilateral Administrative Order issued May 31, 2000 and amended on August 29, 2001, by the U.S. Environmental Protection Agency ("U.S. EPA") under Section 106 of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended by the Superfund Amendments and Reauthorization Act of 1986 ("CERCLA").

The Illinois Environmental Protection Agency ("Illinois EPA") is in receipt of the following documents:

--September 14, 2004 submittal from Hurst-Roche Engineers, Inc. ("...information that has recently been provided to the U.S. Army Corps of Engineers, Illinois Department of Natural Resources Office of Water Resources, and the Illinois Environmental Protection Agency Bureau of Water as part of the Joint Application Process.").

--September 28, 2004 Plans for Proposed Federal Aid Highway, Sheets 1, 4, 10, 23, 40-42.

Based on a review of these documents, and discussions with the county highway department and other parties on September 28, 2004 and October 26, 2004, the Illinois

EPA will not object to the proposed road improvement project, if it does not

Mr. Nabil Fayoumi

January 11, 2005

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interfere with the terms and conditions of the Unilateral Administrative Order. The Illinois EPA offers the following comments and conditions.

1. Any material removed from Dead Creek as part of the cut and fill requirements for the road improvement project must be properly disposed at the on-site TSCA cell, or properly disposed off-site as a special nonhazardous or hazardous material.
2. The project should include necessary provisions, such as installation of a sump and silt fencing, etc., on the downstream side of the Judith Lane crossing, to prevent any creek soil disturbed by the construction activities from washing down the creek and possibly contaminating downstream segments of Dead Creek.
3. Additional riprap material must be provided at the 36 inch storm sewer outlets if the quantities shown on Sheet 23 are inadequate for flow dissipation and controlling erosion and scouring of creek soil downstream.
4. This letter does not comment on storm water drainage issues in Dead Creek, and any impact of the road improvement project on same.
5. The work under the road improvement project must not impact the integrity of the new liner in Creek Segment B (north of Judith Lane), within the limits of construction.

Should you have any questions or comments on the contents of this letter or the attachments, please feel free to contact me at 217/557-3199.

Sincerely,

Sandra Bron, Remedial Project Manager
National Priorities List Unit
Federal Site Remediation Section
Bureau of Land

Cc: Terry Ayers, Manager, NPL Unit
Bruce Yurdin, Bureau of Water
Pat Giordano, Illinois Department of Natural Resources
Michael Coffey, USFWS

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